

Hazardous Waste Handling Facility Security Plan



Revision 0
Effective Date: September 25, 2003

Waste Management Group
Environment, Health and Safety Division
Lawrence Berkeley National Laboratory

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1. Statement of Purpose

This Security Plan has been developed to satisfy the requirements of 49 CFR 172.800 for operations at Lawrence Berkeley National Laboratory's (LBNL's) Hazardous Waste Handling Facility (HWHF). The regulation requires that each person who offers for transport any quantity of hazardous material that requires placarding develop and implement a security plan. The regulation also requires that each HAZMAT employee be trained and familiar with the plan.

LBNL is committed to the safety and security of its employees and contractors. All employees are urged to report any suspicious incidents to Site Security.

2. LBNL Site Description

LBNL is a facility owned by the U.S. Department of Energy (DOE) and operated by the Regents of University of California (UC) under contract with DOE. LBNL is located on land owned by UC and leased to DOE. The LBNL property itself consists of approximately 200 acres of land situated primarily on the hillside area above the UC Berkeley campus, 10 miles east of San Francisco. Most of LBNL is located within the City of Berkeley, a largely university-associated and residential community. A small portion of LBNL is located at Donner and Melvin Calvin Laboratories on the UC Berkeley campus. The HWHF, however, is located in the eastern portion of LBNL, within the Oakland City limits.

3. HWHF Description

The HWHF is located in the eastern portion of LBNL, within the Oakland city limits. The HWHF includes Building 85 and its associated yard area. LBNL is a multidisciplinary research facility that generates hazardous, radioactive, and mixed waste (waste that is regulated as hazardous waste under RCRA and contains radioactivity). Within LBNL, the HWHF is the designated facility to receive only LBNL-generated waste for storage, treatment, packaging, and ultimate disposal at permitted offsite disposal facilities. The Waste Management Group (WGM) of the Environment, Health & Safety Division manages the HWHF. Radioactive waste and various categories of chemical wastes are generated in small quantities by LBNL research and support operations. These wastes are picked up from generator sites by WGM's Operations Team staff members or contractors and transported to the HWHF. The wastes are stored in appropriately designed storage units through out the HWHF prior to shipment for offsite disposal.

4. Vulnerability Assessment

4.1 Personnel Security

WMG will implement the following provisions with regard to the employment of personnel who will be responsible for preparing hazardous, radioactive, and mixed wastes for transportation in commerce. Additionally, WMG may, at its discretion, implement some or all of these provisions relevant to the employment of non-driver personnel who perform functions regulated by the U.S. Department of Transportation's Hazardous Material Regulations within Title 49 of the Code of Federal Regulations.

- Contact previous employers and references.
- Determine employment history, including investigating the gaps in employment.
- Ensure that HAZMAT drivers have a current California Driver's License (CDL) with appropriate endorsements.
- Verify that employees are U.S. citizens, or that non-citizens have documentation appropriate for their immigration status.
- Maintain employee information in a secure manner, and in compliance with all relevant federal and state regulations and statutes regarding confidentiality and individual privacy.
- Collect Laboratory identification badges and any security materials when an employee leaves the Laboratory. Update Web sites and lists to reflect employees' departures. Cancel passwords to prohibit computer access by former employees.

4.2 Unauthorized Access

4.2.1 General

The LBNL security program is designed to prevent unknowing entry and minimize the possibility for unauthorized access into the site.

The security program at LBNL, which encompasses the HWHF, consists of:

- Security personnel provided by the UC Berkeley Campus Police Department.

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4. Vulnerability Assessment (continued)

4.2.1 General (continued)

- LBNL contract site security force operating 24 hours a day, 7 days a week to control access to the LBNL grounds entrances. In addition, this security force patrols LBNL and responds to calls for security assistance and intrusion alarms (dispatcher center located at Blackberry Canyon Gate).
- Perimeter fencing that surrounds LBNL, and additional fencing surrounding the HWHF.
- HWHF gate intrusion alarms that notify the LBNL contract site security force.
- Operational procedures requiring all gates, buildings, and hazardous, radioactive, and mixed waste storage units within the HWHF to be locked when not in use (i.e., except during handling and transferring operations).
- A HWHF visitor's log to control access.
- A card key security system for authorized personnel only.

4.2.2 Access to the LBNL Main Site

Contiguous perimeter fencing (8-foot high chain-link fence topped with three strands of barbed wire) prevents unauthorized access to the LBNL main site. LBNL uses a contract site security force and a card access system to control access at the three LBNL facility entrance gates: Blackberry Canyon, Grizzly Peak, and Strawberry Canyon. The LBNL contract site security guards are instructed to stop vehicles that do not display an LBNL parking pass authorizing facility entry. LBNL employees are required to process a visitor pass in advance for visitors that are scheduled to visit the site. The list of visitors is available at all gates. The visitors are required to stop at the gate and identify themselves by means of an official ID card (i.e., drivers' license). If the person is on the visitor list, a parking pass is issued and he/she is logged in. Visitors for whom an advanced pass has not been processed are required to:

- Identify themselves and provide proof of identification.
- State who they are visiting.
- State which building or area they will be visiting.

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4. Vulnerability Assessment (continued)

4.2.2 Access to the Main Site (continued)

The guard is required to contact the LBNL employee being visited and confirm the information provided prior to processing a parking/entry pass for the visitor.

The Blackberry Canyon Gate is the main entrance to the LBNL facility. LBNL contract site security personnel are at the gate 24 hours a day, 7 days a week. The Grizzly Peak Gate is open from 6:30 A.M. to 9:00 A.M., Monday through Friday. The Strawberry Canyon Gate is open from 6:30 A.M. to 6:30 P.M., Monday through Friday. The Grizzly Peak and Strawberry Canyon Gates are locked by the LBNL contract site security force during off-hours and are monitored by patrol units.

All three security guard gate kiosks are equipped with communication access to the LBNL contract site security force. The Blackberry Canyon security kiosk is equipped with a radio and telephone. The Strawberry Canyon and Grizzly Peak security kiosks are equipped with telephones and two-way radios when the gate is manned by a security guard. Patrol units respond to security calls and provide detainment or assistance as needed.

During off hours, the Grizzly Peak and Strawberry Canyon vehicle gates are accessible to authorized employees through a card access system. Departure from Strawberry Canyon and Grizzly Peak Gates is accomplished by opening the gate using a proximity sensor.

The gate closest to the HWHF is the Strawberry Canyon Gate (500 feet southeast of the HWHF).

4.2.3 Access to the HWHF

In addition to the perimeter fencing around the main site, there is a secondary chain-link fence with three strands of barbed wire around the perimeter of the HWHF. Three gates provide access to the HWHF: the two east gates provide routine access, whereas the west gate is solely intended for emergency vehicle access. The east gates are electric-power driven and have a card key security system. These systems have employee-specific access codes that identify personnel, and record entry and exit times. The gates are also equipped with an alarm system to indicate forced entry. Contract security guards are required to respond/investigate all alarms at the HWHF unless the cause of the alarm is known and valid. WMG personnel are required to inform security guards if they are working after hours at the facility (later than 7 P.M. during work days and any time during the weekends).

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4. Vulnerability Assessment (continued)

4.2.3 Access to the HWHF (continued)

The contract security guards also perform routine rounds of the LBNL site, including the HWHF during after hours and weekends. The contract security guards have been instructed to contact HWHF personnel when the following observations are made:

- When there is any sign of forced entry (in which case they are also required to call the UC Berkeley police department).
- When there is more than one alarm during a shift and the cause cannot be determined.
- When there is an entry by unauthorized personnel.

The security guards have a list of the HWHF contact names and phone numbers in case of an emergency.

The west gate is a double-swinging gate secured with a padlock. Signs warning against unauthorized entry to the site are posted on the perimeter fences of the HWHF.

Authorization for card key access to the HWHF is controlled. WMG personnel (excluding the administration staff) have card key access to the facility. The WM Group Leader authorizes card key access for other LBNL employees who require access to the facility due to the nature of their jobs (e.g., Fire Department, maintenance personnel). Depending on the level of access (i.e., access to the waste storage areas vs. yards or maintenance rooms) non-WM personnel would be required to complete different levels of training prior to approval for obtaining card access to the HWHF.

HWHF visitors (non-WMG personnel) are required to register at the reception area inside Building 85 before entry to the HWHF. WMG personnel escort those visitors who are not authorized for unescorted access to the HWHF at all times. Signs posted on entrances to the HWHF state that visitors must log in at the Building 85 reception area and must be escorted by HWHF personnel.

Furthermore, HWHF personnel are instructed to guide visitors to the Building 85 reception area and advise them of log-in procedures. The following information is recorded in the HWHF visitor logbook:

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4. Vulnerability Assessment (continued)

4.2.3 Access to the HWHF (continued)

- Name of visitor
- Time of entry and exit
- Name of visitor's escort
- Badge number
- Area being visited.

The visitor logbook is maintained in order to identify individuals entering the HWHF for emergency and evacuation purposes. Visitors are assigned a badge or are escorted by an employee with a badge to the designated area. Upon exiting the HWHF, visitors must log out, entering the time of their exit, and return badges if they were assigned one.

Wastes received at the HWHF are stored in specially designed storage rooms with state-of-the-art safety features. The majority of the wastes are packaged in secondary storage containers prior to storage at the facility. This provides a second layer of security for direct access to the actual waste. The doors to the rooms are locked during off-hours and weekends.

The Operations Team Leader (OTL) or operation technicians designated by the OTL perform a daily walkthrough of the facility to ensure that waste containers are stored properly and that all doors to storage rooms and gates are locked. The OTL or a designee also performs a more detailed weekly inspection of the facility, which includes a check of the waste inventory.

4.2.4 Communications: Responding to Security Threats

In the event of a security threat or breach involving hazardous materials, employees have been trained to respond in the following manner:

Imminent Threats

If an employee witnesses a criminal act or observes someone with the intent to commit a criminal act, the employee must proceed to a safe and secure location and immediately notify LBNL Security. Employees must provide any and all information requested and should contact their supervisor as soon as possible. Employees must remain in a secure location until security arrives on the scene or until they receive direction from their supervisor.

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4. Vulnerability Assessment (continued)

4.2.4 Communications: Responding to Security Threats (continued)

Potential Threats

If an employee witnesses actions or behaviors that they believe are suspicious and could pose a potential threat, the employee must notify his/her supervisor or the security immediately.

Collecting Information

Employees should collect all relevant information related to a potential threat or security breach to the degree possible and, if it can be done, from a secure location. If the suspicious behavior involves a vehicle, employees should note:

- Time of day
- Exact location
- DOT number
- License registration number
- Make and model
- Color of vehicle
- Direction of travel, if applicable
- Description of driver
- Description of occupants
- Specific suspicious activities being performed.

If the potential threat or security breach involves an individual or group of people, employees should note:

- Time of day
- Number of people involved
- Height and weight
- Description of clothes
- Hair color
- Eye color

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4. Vulnerability Assessment (continued)

4.2.4 Communications: Responding to Security Threats (continued)

- Direction of travel
- Any names used in conversation
- Specific suspicious activities being performed.

All collected information must be turned over to LBNL's Security and Emergency Operations head or representative.

4.3 En Route Security

Operations technicians load trucks transporting waste from the HWHF to offsite disposal facilities at the HWHF yards. WMG personnel supervise the loading. Access gates are closed while the trucks are being loaded. WMG contracts with reputable companies for management of LBNL waste. WMG has contracts with two companies for disposal of hazardous waste generated at LBNL. These companies generally use their own transportation department to pick up the waste from the HWHF. WMG has requested a copy of their security plan or a letter certifying that they have all appropriate plans in place to meet the new DOT requirements. Transporters that have direct contract with WM will also be asked to provide a copy of their plan or a letter of certification of the compliance with the new DOT requirements.

WMG has developed the following checklist with regard to the driver's documentation and loading requirements prior to release of a shipment:

Driver's Documentation

- Does the driver carry a valid driver's license with HAZMAT endorsement and current (within two years) medical certification?
- Is the current vehicle registration tag on the license plate?
- Has the driver performed a Driver's Daily Vehicle Pre-trip Inspection (check report)?
- Did the driver find the vehicle to be in a safe condition?

Containers (Loading)

- Are all containers on the truck listed on the shipping paper?
- Do wastes meet DOT segregation requirements?

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4. Vulnerability Assessment (continued)

4.3 En Route Security (continued)

If all items above are answered “yes,” the shipment may be released. If the answer to any of the above questions is “no,” the Compliance Team Leader or designee must fill out a nonconformance report and hold the shipment until each “no” answer can be explained satisfactorily.

The OTL will ensure that the driver has the capability to communicate emergency messages to the emergency response contractor and/or the shipment broker in an emergency. Options include a satellite communication system, cell phones, two-way radios, or scheduled call-in times. Drivers are instructed to not discuss any details about their load or arrival times with strangers, such as over CB radios or at truck stops. Where necessary, preferred shipment routes will be provided to the driver.

Before a shipment is released, the Operations and/or Certification teams will ensure that all relevant shipping papers are signed and all required shipping papers are given to the driver prior to departure. LBNL contract security will escort the truck to the site gate if necessary.

5. Training

All HAZMAT employees will be trained on general security awareness principles and the requirements of this Security Plan.
